



FUTURE LAND USE CONCEPT

Town Of Canmore

Prepared by: The Alpine Club of Canada



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ALPINE CLUB OF CANADA (ACC) FUTURE LAND USE CONCEPT

1) EXECUTIVE SUMMARY

The Alpine Club of Canada (ACC) is proposing an amendment to the Canmore Land Use Bylaw on its Provincial lease land in the Town of Canmore. A Future Land Use Concept will guide the implementation of that amendment over time. Future projects include;

- a) Adding employee housing by way of additions / renovations to existing structures, and potential addition of new structures.
- b) Demolishing and replacing the existing maintenance building in favour of a new building serviced with water and sewer in a more suitable location.
- c) Relocating and consolidating open storage in a single fenced location.
- d) Reimagining visitor accommodation to respond to today's market with no increase in current bed numbers.
- e) Improving parking availability for ACC users and Grotto Mtn / Echo Canyon / Bataan Trailhead users in accordance with the Canmore Area Trails Master Plan (CATMP) currently under consideration.
- f) Renewing on-site water and sewer infrastructure over time to be commensurate with future demands.
- g) Realigning /re-grading the current access road to better meet Town standards.
- h) Improving emergency vehicle access.
- i) Relocating, reorganizing and improving office space to enhance staff retention and work experience by way of addition of new structures or additions / renovations to existing structures.

Intensity of Staff and Visitor Accommodation - The ACC lease is within a wildlife habitat patch in the Towns planning documents. Historically, the Town has used bed counts as a measure of “intensity of use.” Therefore, the Future Land Use Concept intends to retain the overall number of beds for visitors at the current level (60 beds). The Future Land Use Concept does however propose to increase the availability of staff housing beds and redesign visitor accommodation with updated amenities, while remaining the most affordable option in the valley for travellers. The Future Land Use Concept identifies a strategy to renew worn and substandard infrastructure over time.

Application Process - The Future Land Use Concept will be implemented through an amendment to the Town of Canmore Land Use Bylaw (LUB) to a Direct Control District (DC) from the current Conservation of Wildlands (CW) District. An application to the Town of Canmore for a land use bylaw amendment was submitted in 2025. **See Attachment 11 for the proposed DC District.** The application refers to a 4.8 hectare (11.86ac) parcel - Town of Canmore Parcel ID: 432464, being Plan 1192LK. An Environmental Impact Statement (EIS) has been reviewed by the Town and accepted as completing the Town's terms of reference. Upon passing of the DC District, additional consulting reports will be undertaken to support future Development Permit applications and in accordance with the Future Land Use Concept.

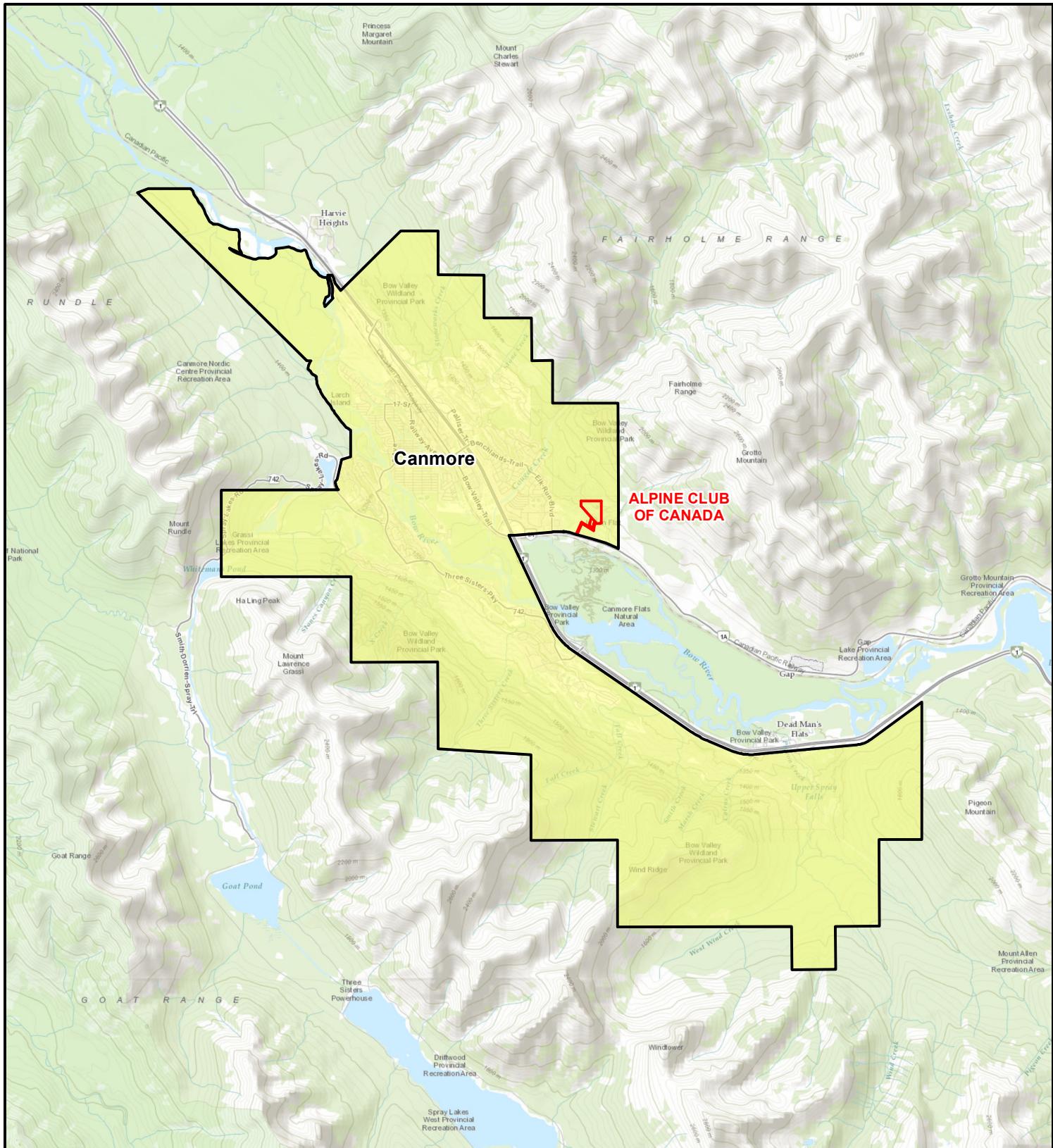
A pre-application meeting for a DC application was held with ACC staff and Town of Canmore staff on March 4, 2025 to clarify the type and amount of information required for DC application approval. This



was documented in the review document issued by Town planning staff on March 6, 2025. The DC District and future Land Use Concept conform to the information requirements outlined at the time by Town staff.

2) ACC NATIONAL CLUBHOUSE VISION STATEMENT

The Alpine Club of Canada Canmore Clubhouse is widely recognized as the heart of mountaineering in Canada. Members and the entire Bow Valley community connect with each other over mountain condition reports, route beta and skill development courses. With facilities incrementally refreshed over the past decade, the upgraded Clubhouse visitor accommodation is the best value in Canmore, attracting ACC members from across Canada and the world to set up their base camp in a stunning setting. Visitors stop at the Canmore Clubhouse and often carry on exploring one of the most comprehensive alpine hut systems in North America. A proposed new maintenance shop and access road will ensure existing and future huts improve renewable power sources, sanitation and preventative care. ACC values staff retention and exceptional service to members. New, well-equipped offices, quality employee housing on-site and a commitment to always do things better makes the ACC a preferred employer for eager adventurers. There is no better place than ACC Canmore to begin the journey of discovery.



Legend

— ACC Lease Boundary
[Yellow Box] Town of Canmore



MAP 1 LOCATION

Future Land Use Options



File: ACC 01

Date: 2025-02-07

MxD: ACC 01 Location 2025 02 02

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3) ACC'S LOCAL HISTORY

(see Attachment 8 for detailed history)

The Alpine Club of Canada has a long history in the Canmore area. The ACC National Clubhouse complex has occupied its current Provincial lease since 1972, originally within the MD of Bighorn (see Location Map Attachment 1). It represents an integral part of Canmore's mountain culture and continues to be an important community meeting place. It also offers one of Canmore's most affordable visitor accommodation in a rustic, yet accessible setting.

The ACC is a not-for-profit organization and represents 26 different Club Sections and 13,000 members nationally. It maintains 26 backcountry huts across Alberta and British Columbia and will continue to increase that number as opportunities arise through partnerships with Parks Canada and BC Parks.

ACC provides a unique and exceptional benefit for the mountain community in Canmore and Canada. Besides the alpine huts in its care, ACC offers affordable visitor accommodation in the Bow Valley. Like many local businesses and organizations, the ACC also needs more employee housing. The ACC also needs safe road access and improved maintenance capacity to meet their responsibilities in light of the growing demand for alpine hut use. The current Provincial lease offers an affordable land base with which to provide added staff accommodation and a maintenance base for huts under the care of the ACC. There is also a need to refresh visitor experience/amenities and this can be accomplished without increasing the existing number of beds on site.

4) PROJECT NEED

The ACC is proud of its heritage. However, the organization is now at a crossroads regarding long-term sustainability at this location. Therefore, the ACC is undertaking a long-term Future Concept Plan for its National Clubhouse located in Canmore. This concept supports an application for a Town of Canmore land use bylaw amendment to Direct Control (DC), submitted in 2025 (see also Survey Lease / proposed Direct Control (DC) area Map Attachment 2).

The timing for this project is based on factors identified in the following section (see also Site Issues Map Attachment 3);



4.1 Additional Employee Housing Needs

Since its establishment in 1906, the ACC mandate has been to facilitate alpine experiences in a safe and welcoming environment for the benefit of the public in Canada and around the world. The ACC meets these objectives through a team of dedicated individuals based out of the Canmore National Clubhouse office. Seasonal and year-round staffing needs have been growing, affordable staff housing in Canmore has been scarce.

The need for staff housing is pressing. In 2024, 6 staff resorted to living out of their vehicles, some using the Town of Canmore Safe Park program. Recruitment of qualified staff is challenging with limited staff housing.

Purchasing staff housing in the current Canmore retail market is outside of ACC's financial capacity. The ACC proposes to build additional staff housing on the current lease land. It is possible to build an addition onto the current staff accommodation building (known as "the Panabode") providing three new bed spaces, bringing the total staff accommodation availability to six bed spaces. A building permit approval under the existing CW LUB district has been approved in the past and ACC may apply for a Development Permit under this District to improve employee housing with minimal site disruption. Additional beds are proposed in the medium term for a further 9 beds for a total of up to 15 beds on the lease in flexible configurations to existing buildings or stand-alone units. These would be more clearly defined at the development permit stage and reviewed through annual budgeting.

4.2 Inadequate Maintenance Facilities

The existing maintenance building serves the ACC's backcountry huts, Shadow Lake Lodge, the on-site visitor accommodation and ACC offices. When the ACC lease was first occupied in 1972, the Canmore-based ACC maintenance facility cared for the upkeep and renovation of 6 huts. In 2025, the same maintenance facility is now responsible for 26 huts. By 2030-31, that will expand to 29 huts. The current maintenance shed is well past its lifespan and has not met the needs of the maintenance team for years. Issues with the current maintenance structure are numerous, including: no indoor plumbing, undersized in relation to service demand, no indoor storage for vehicles, no properly secured yard and laydown area, a porous building (rain and snowmelt seeps into the building), steep grades on narrow roads and insufficient parking to accommodate ACC users, let alone expected public land users.

The access road right of way is used for open storage of propane tanks, waste barrels, firewood, garbage bins, vehicles and more. The storage area is the first thing visitors see on their way to the clubhouse. This diminishes the guest's sense of arrival at the ACC and indeed reflects poorly on ACC and Canmore itself.

Level land located south of the current maintenance building (within DLO 929883) was considered as a maintenance site. However, the lease is jointly held with the Bow Valley Riding Association (BVRA). The BVRA did not agree to allow this site to be used as a maintenance facility. As such, ACC has limited options to relocate the maintenance yard on the lease.



ACC has searched for alternative locations, but other options in the Bow Valley are not economically feasible. Alternative Crown lease land in the vicinity is not available according to Provincial land managers. While the ACC did consider moving the operation to another community in British Columbia, the Board of Directors strongly believe the ACC national office /maintenance facility is an integral part of the Canmore community and should remain in Canmore unless and until there is no other option.

Therefore, it is proposed to demolish the existing maintenance building, replacing it with a new structure/ secure outdoor storage yard on a plateau to the north of the existing Bell and Boswell cabins.

4.3 Access and Circulation Issues

The ACC access road does not conform to current Town of Canmore standards. Indian Flats Road is narrow, steep with some turns too tight for larger vehicles. The road is approximately 800m long, with an overall climb of 58m. The first 500m is a gentle 7% grade. The final 120m sees the road climb 23m with an average grade of 19%.

Vehicles of all types find it difficult to negotiate and turn around on the existing access road leading to the clubhouse. With such steep grades, this issue becomes a serious liability on icy winter days, especially if emergency vehicle access is required.

Many pedestrian and cyclists find the hill to be too steep to walk or bike. While some cyclists see climbing the hill as an accomplishment, it is simply too steep for most cyclists to climb.

A safer vehicle circulation pattern is needed to access the existing and proposed structures. It is proposed to realign the existing road to decrease the gradient and improve vehicle and pedestrian access. McElhanney Consulting has prepared initial engineering concepts for the realignment of the road, described cut and fill profiles and parking opportunities to meet long term demand.

4.4 Inadequate parking and off-site recreation users

Parking is an area of significant conflict within ACC leases. The ACC has guests, staff and members of the public parking at and near the ACC to access the trail network and climbing areas on Grotto Mountain. There is parking available at the ACC for 24 vehicles. ACC guests and staff regularly exceed this parking capacity. Parking overflow for trail users and guests along the access road offers approximately 30 additional spaces. During busy periods in spring, summer and fall, the available parking spaces will be exceeded forcing the access road to serve as overflow parking sometimes reaching Highway 1A. This conflicts with maintenance functions which are forced to occupy the road right of way. On several occasions, trail users attempted to park in the ditch and in the Indian Flats fields.

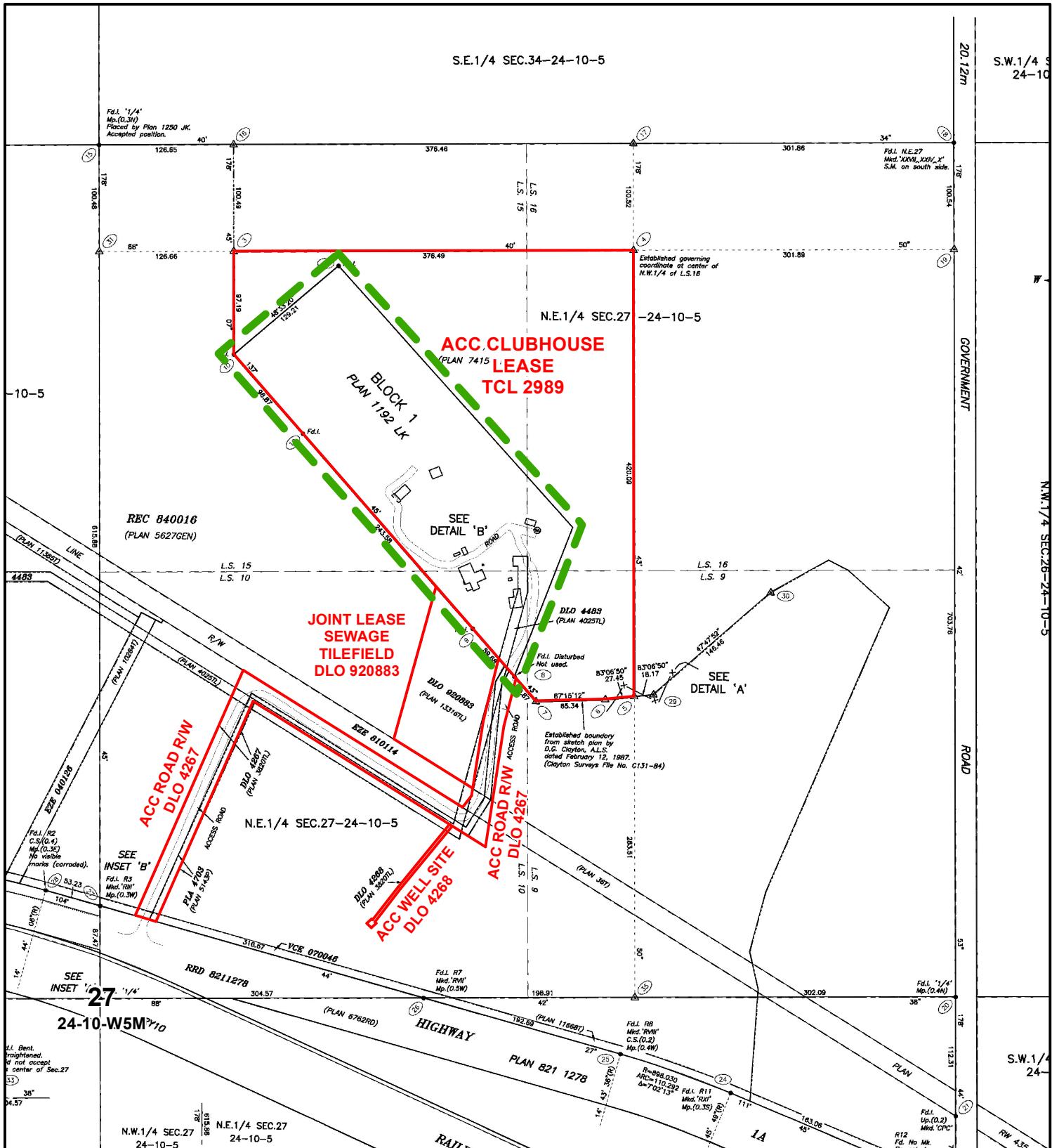
The ACC regularly receives complaints from the Bow Valley Riding Association (BVRA) regarding the parking situation on the road. With the access road clogged with parked vehicles, this hinders equestrian riders and their own vehicles from crossing into the BVRA lease lands. It also becomes a significant walk to the clubhouse for ACC users when the existing upper parking areas are full.



Added parking capacity in this area is required. This is not only an ACC issue, but also an issue for the Province and the Town. The benchlands area above the Clubhouse lease is a popular destination for recreation. The **Canmore and Area Trails Master Plan (CATMP)** advisory group has identified the trailhead parking at the ACC as an item needing attention. There is an opportunity to better manage user traffic in the wider area. If additional parking is not provided at the ACC, the Town or Province will need to provide additional parking for the benchlands recreation users. Access and parking demands in this area is high and demand is expected to increase in the future.

It is proposed that the ACC create additional parking areas to accommodate up to 140 parking spaces within the primary ACC lease lands and in accordance with the Future Land Use Concept.

S.W.1/4 S
24-10



Legend

- ACC Lease Boundary
- Proposed Land Use Bylaw Amendment
From Conservatoion of Wildlands (CW)
to Direct Control (DC)

ACC CLUBHOUSE LEASE



ALPINE CLUB
OF CANADA
CLUB ALPIN
DU CANADA

MAP 2

Proposed LUB Amendment

A horizontal scale bar representing 200 meters. It features a thick black line with numerical markings at 0, 50, 100, and 200. The word 'Meters' is written in black text at the end of the bar.



File: ACC 02

Date: 2025-09-17



4.5 On-site sewer limits

The on-site septic tile field serving the clubhouse is a separate lease and the infrastructure will require renewal. Some sewer pipe mitigations were undertaken in 2022 but the tile field should be replaced in the short to medium term. The lease (DLO 920883) is jointly held between the ACC and the BVRA. It is expected that the tile field will be renovated as the Future Land Use Concept is implemented over time.

5) PROJECT BACKGROUND

5.1 Clubhouse Infrastructure and Provincial Dispositions

The clubhouse complex is located within the town of Canmore on an 11.91 ha (29.4ac) site just north of Highway 1A as a Provincial Tourism Commercial Lease (TCL 2989) (see lease survey Map Attachment 2). The original 1972 lease was located in the MD of Bighorn, (then under the MD's 'Special Recreation' – R, Land Use Bylaw District) and was part of lands annexed to the Town in 1991 for purposes of "future development" according to 1991 Provincial annexation documents. The main ACC lease site contains 6 buildings, some ancillary structures and parking for approximately 24 onsite and another ± 30 vehicles of informal parking along the access road back towards Highway 1A. The site is currently serviced by an on-site water well (DLO 4268). The Water Source is a 23 m deep well, 366 m south of the clubhouse between the 1A Highway and the ACC / Bow Valley Riding Association access road.

Wastewater is managed through a gravity-fed tile field on Crown land under a separate 1.025 ha (2.53ac) License of Occupation (DLO 920883) – currently a shared LOC with the BVRA - located adjacent to and directly south of the main lease land. The sewer and grey water drain to a series of three septic tanks on the north side of the road below the Clubhouse, and then to a septic field located south of, and 22 m below the clubhouse. Road access (DLO 4267 & 4268) is by way of gravel road from Highway 1A.

5.2 Policy Framework

The Alpine Club of Canada was granted a Miscellaneous Lease (MLL 2989) on Crown land by the Province in 1972. In 2024, the Crown renamed the lease to TCL 2989 in recognition of its revised status as a Commercial Lease.

The Town replaced the 1992 General Municipal Plan with the 1998 Municipal Development Plan. The MDP policies adopted the findings of the Bow Corridor Environmental Advisory Group (BCEAG) as the Wildlife Corridor and Habitat Patch Guidelines (1999, rev. 2012). The Canmore Land Use Bylaw subsequently rezoned the ACC lease site to Conservation of Wildlife (CW) District – which is the current LUB District. Expansion, renovation or alteration of the land has therefore been difficult, but still possible. Over the years, the ACC periodically added structures on and off the Clubhouse lease to accommodate the dynamic growth in alpine hut and hostel accommodation. The last development permit application for additional capacity since adoption of the 1998 MDP was in 2005 for the Boswell Cabin. This was approved in the context of an Environmental Impact Statement and within the parameters of MDP policy in effect at that time.



5.2.1 Current MDP Policy - The existing MDP policy (section 4.2) allows for the continuation of existing development and accessory uses but discourages expansion or “intensification”....unless exceptional community benefit can be demonstrated”. The relevant sections are as follows;

Development in Conservation Areas

- 4.1.1 Conservation areas are generally accommodated in those areas identified on Map 2 – Conceptual Land Use.
- 4.1.2 Development in Conservation areas should be limited to recreational use, agricultural uses, infrastructure and utilities, and will be subject to any additional restrictions on these activities contained in the MDP including Environmentally Sensitive Areas policies contained in Section 4.2.
- 4.1.3 Notwithstanding 4.1.2, existing development in Conservation areas will be permitted to continue.
- 4.1.4 Changes in zoning for lands within Conservation areas that would allow new or additional development of those lands shall be discouraged unless exceptional community benefit can be demonstrated. Should an application for amendment be considered, an EIS will be required to be prepared and potential impacts of the development are addressed and mitigated.

Existing Development Within Wildlife Corridors and Habitat Patches

- 4.2.9 Existing development and uses accessory to the existing development in wildlife corridors and habitat patches will be allowed to continue, however, expansion of development footprint or intensification will be discouraged.
- 4.2.10 Where expansion of development footprint or intensification of an existing use within a wildlife corridor or habitat patch is considered, the Town will require an EIS to be prepared.

New Development Within or Adjacent to Wildlife Corridors and Habitat Patches

- 4.2.11 No new development shall be allowed within a habitat patch or corridor, excepting:
 - infrastructure and utilities may be allowed to be located within or to cross a habitat patch or corridor in the least intrusive manner possible, and
 - b. non-intensive, trail-based recreational uses may be allowed.

Development Exempted from BCEAG

- 4.2.15 For development proposals which have been exempted from the BCEAG Wildlife Corridor and Habitat Patch Guidelines for the Bow Valley (2012), development shall be in accordance with an accepted EIS or an area structure plan, as amended from time to time.

5.2.2 Wildlife Corridor and Habitat Patch Guidelines (2012) - The BCEAG guidelines recognized the potential for existing land uses to be inadvertently frozen and made allowances to prevent legal, non-conforming uses. Specifically;

(p.3) 2.0 Development Proposals

...Other projects that are specifically exempt from these guidelines include the following:

- projects for which approvals have been previously granted by the Natural Resources Conservation Board (NRCB) prior to July 1999 (e.g., Three Sisters Mountain Village);
- projects that conform to an already approved area structure plan, area redevelopment plan, master plan, land use bylaw or subdivision approval issued prior to July 1999;
- projects that have existing valid development permits issued prior to July 1999;
- existing developments that have valid surface leases or existing letters of intent from the provincial government issued prior to July 1999;...

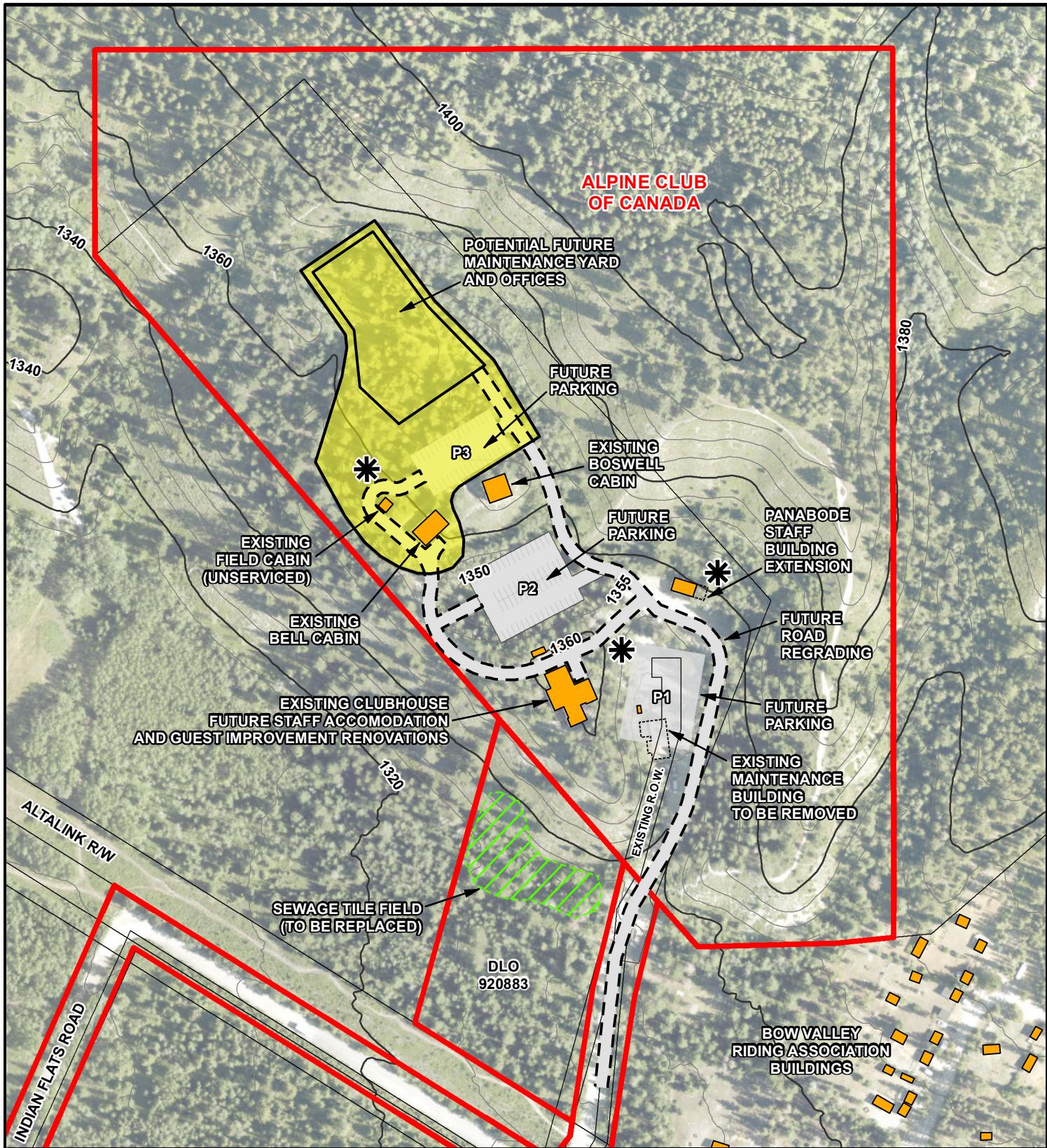
5.2.3 ACC Policy Reconciliation - The policy excerpts above suggest various interpretation regarding the future of the ACC clubhouse complex. ACC believes the intent of the exemption for valid leases and development permits is to avoid creating non-conforming uses. Hopefully, the Town and Province recognize the ACC as an institution that will continue to demonstrate exceptional community benefit.



The principles associated with the proposed DC District are discussed in the Future Land Use Concept below. The proposed DC District Bylaw amendment identifies a framework for future development and re-development in conformity with the supporting Concept document.

6) DRAFT FUTURE LAND USE CONCEPT

The ACC has prepared a long term Concept Map (see ACC Clubhouse Lease Future Land Use Map **Attachment 4**). The purpose of the Concept is to serve as a template for improvements on the leased land over time. Since the ACC is a Not-for-Profit organization, implementation would occur as finances allow. The Concept would serve as a referral document for the ACC, Provincial lease managers and the Town Approving Authorities for future development permit applications under the proposed ACC DC District.



Legend

- ACC Lease Boundary
- Existing Building
- Potential Road Re-Alignment and Regrading to 10% where feasible
- Future Redevelopment Potential - Maintenance Yard, Offices, Parking, Employee Housing, Visitor Accommodation
- Potential Employee Housing Site

- Contour (20m Interval)
- Contour (5m Interval)
- Depression (5m Interval)



ACC CLUBHOUSE LEASE CONCEPT PLAN

MAP 4 Future Land Use

0 5 10 20 30 40 50 60 70 80 90 100 Meters
1:2,500



File: ACC_04

Date: 2026-01-15



6.1 Concept Principles

The draft Future Land Use Concept is intended as a framework document to guide the development permit review/ approval stages by municipal and provincial authorities. The Concept principles are as follows.

- a) The overall **objectives** include;
 - Improve staff housing capacity,
 - Replace the current maintenance building and storage yard,
 - Refresh visitor accommodation amenities to align with current market expectations,
 - Improve and increase physical office space,
 - Regrade the access road to closer meet Town standards,
 - Rationalize and consolidate parking capacity to meet demand in line with ACC future needs and the Canmore and Area Trails Master Plan (CATMP).
- b) **Modernize existing facilities** overdue for renovation or replacement. The existing accommodation/office buildings and associated infrastructure will remain within the lease site. The current maintenance building will be demolished and replaced.
- c) **No change in the existing numbers** of visitor accommodation beds but rearrange the types of accommodation into a more efficient business model. Detailed configurations and metrics will be detailed at the development permit stage.
- d) **Add additional employee housing options** within existing buildings or in new structures in accordance with a review of evolving needs for style of accommodation (suites, shared accommodation, etc).
- e) **Improve ACC skills development opportunities** with additional parking and more office/meeting space to continue ever-popular skill development courses on site.
- f) **Environmental Impact Statement (EIS) mitigations** will be undertaken to reduce future wildlife/human interactions and enhance wildlife mobility within the project study area. This has been clarified through an EIS that has been accepted as having met Town policy requirements.

6.2 Concept Components

6.2.1 Allocation of Visitor and Staff Accommodation - The total number of potential visitor accommodation will remain within the current bed count of 60 (ie, the total number of paying guests if all beds were occupied). There are currently 60 visitor beds across 3 buildings. Visitor Accommodation shall continue to offer a variety of dormitory style and self-contained units. Renovation of units into alternate accommodation configurations and additions or replacement of existing buildings may be undertaken without an amendment to this District provided the 60-bed visitor accommodation maximum is maintained.



There are currently 3 staff housing units, and the long term intent is to increase this to 15 beds. Staff housing has been difficult to secure off-site and there is adequate land to build more on-site. The current staff housing is short of current and future recruitment and retention needs. ACC will conduct an ongoing evaluation of the most efficiently built form (shared accommodation or suites) for both visitor and staff housing. This will be implemented over time as resources allow.

6.2.2 Maintenance Building/Yard Replacement - A redeveloped maintenance and equipment building, and associated parking is proposed to replace the existing maintenance site. This would create more practical maintenance operations on a larger, level site. The new maintenance building and yard is proposed to be located on re-graded land on the ACC lease land.

The maximum building footprint would be approximately 1500m² of total enclosed space with overhead doors for vehicle storage. The existing maintenance building would be demolished and removed. The existing maintenance, parking and open storage would be moved to a new fenced storage yard adjacent to the maintenance yard. The overall site area requirement for the maintenance building and open storage is estimated at 3300m².

6.2.3 Office Staff Renovations - As the ACC relaunched operations after the pandemic, it was confronted with a situation of severe understaffing, combined with a surge in demand for outdoor recreation and access to backcountry huts. Over the past year, ACC has increased staffing from a low of 18 to a more sustainable level of 30 full-time permanent staff and up to 25 seasonal staff working out of various locations. The office is currently overcrowded with insufficient space for existing staff members. To resolve this, ACC intends to build office space attached to, or in close proximity to the new maintenance building with approximately 1500m² of office space. This will also provide space to improve skill development offerings conducted on site and in preparation for fieldwork.

6.2.4 Regrading and Road Access - The following components address road access.

- a) Reduce road grades (to approximately 10% where possible) to better conform to Town of Canmore standards.
- b) Detailed engineering design will be assessed at development permit stage.
- c) Create level land to address existing awkward slopes and disjointed land use access.

6.2.5 Parking and Pedestrian Circulation - The following components address pedestrian access and parking.

- a) Reconfigure parking to increase availability on the ACC site to meet current and future demand.
- b) Enlarge and reconfigure parking capacity onsite to accommodate user demand without the need to park along the access road. The proposed parking would serve Grotto Mountain trail users.
- c) Enforce parking restrictions on the access road.
- d) Link together existing buildings by contiguous pedestrian, vehicle access and parking.
- e) Design future facilities to be a short pedestrian walk from each other.
- f) Vehicle access should be circular to all core-activity buildings for larger vehicles and emergency responders without the need to back up.
- g) The Canmore Area Trails Master Plan (CATMP) is currently in process. The proposed document refers to trail user parking initiatives at the Grotto Mtn/Echo Canyon/Bataan Trailhead. The ACC Future Land Use Concept will coordinate with policies of CATMP.



6.2.6 Water and Sewer Servicing Renovations - On-site water and sewer servicing has recently undergone improvements and future upgrades will continue. However, the existing sewage tile field located south of the clubhouse will need to be renovated in the short to medium term. This disposal field occupies a separate Provincial lease and is shared with the BVRA, requiring permission to renew the tile field by the Province and the BVRA.

In July 2016, MMM Consulting Group Limited completed a water and sanitary servicing study in anticipation of connecting to the municipal water and sewer trunk line located on Bow Valley Trail (Highway 1A). Discussion with Municipal and Provincial authorities identified subsequent processes and conditions required prior to construction. The ACC has deferred this initiative due to its high capital cost.

6.2.7 Environmental Impact Statement (EIS) - The EIS consulting report includes a desktop survey of existing conditions, a rare plant survey and recommendations for mitigations at the time of future development permit applications. The Town has accepted the document as complete and meeting Town policy.

6.3 Proposed Implementation Mechanism

ACC has an adequate land base to provide added staff housing, modernize its maintenance function and improve its service levels. A municipal bylaw amendment is required to accomplish this.

Therefore, the ACC proposes a mechanism whereby existing visitor accommodation can be maintained at current levels while at the same time allowing for appropriate office, maintenance, proper access/parking and added employee housing. The implementation mechanism is explained below as part of an application for an ACC Direct Control District (DC).

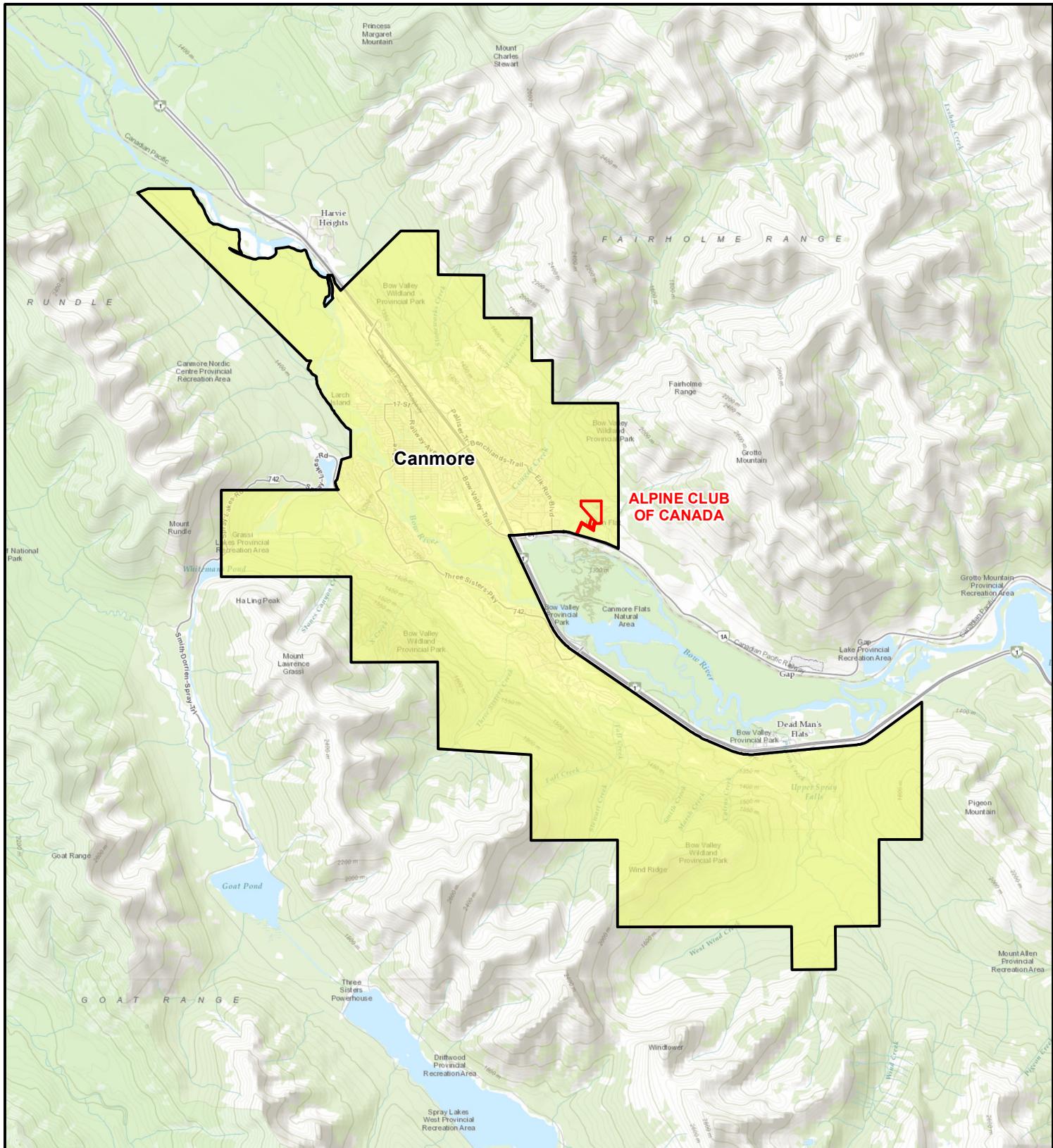
It is necessary that the ACC identify a Future Land Use Concept now and work with the Town and Province to navigate long-term certainty for all interests – Town, Province, BVRA the ACC and Bow Valley recreation user groups that increasingly use the area.

The ACC represents a focal point for Canmore's mountain community, fosters a knowledge economy and this continues to provide an "exceptional community benefit." The proposed Future Land Use Concept will improve public safety, improve staff housing/ staff retention, and enhance visitor experience at the clubhouse and across its many alpine huts. This Concept and the associated supporting consultant reports are intended to be compatible with the long-term viability of wildlife species in accordance with MDP policy and future Provincial/ Municipal human use management initiatives.



ATTACHMENT 1

Location Map



Legend

ACC Lease Boundary
Town of Canmore



MAP 1 LOCATION

Future Land Use Options



File: ACC 01

Date: 2025-02-07

MxD: ACC 01 Location 2025 02 02

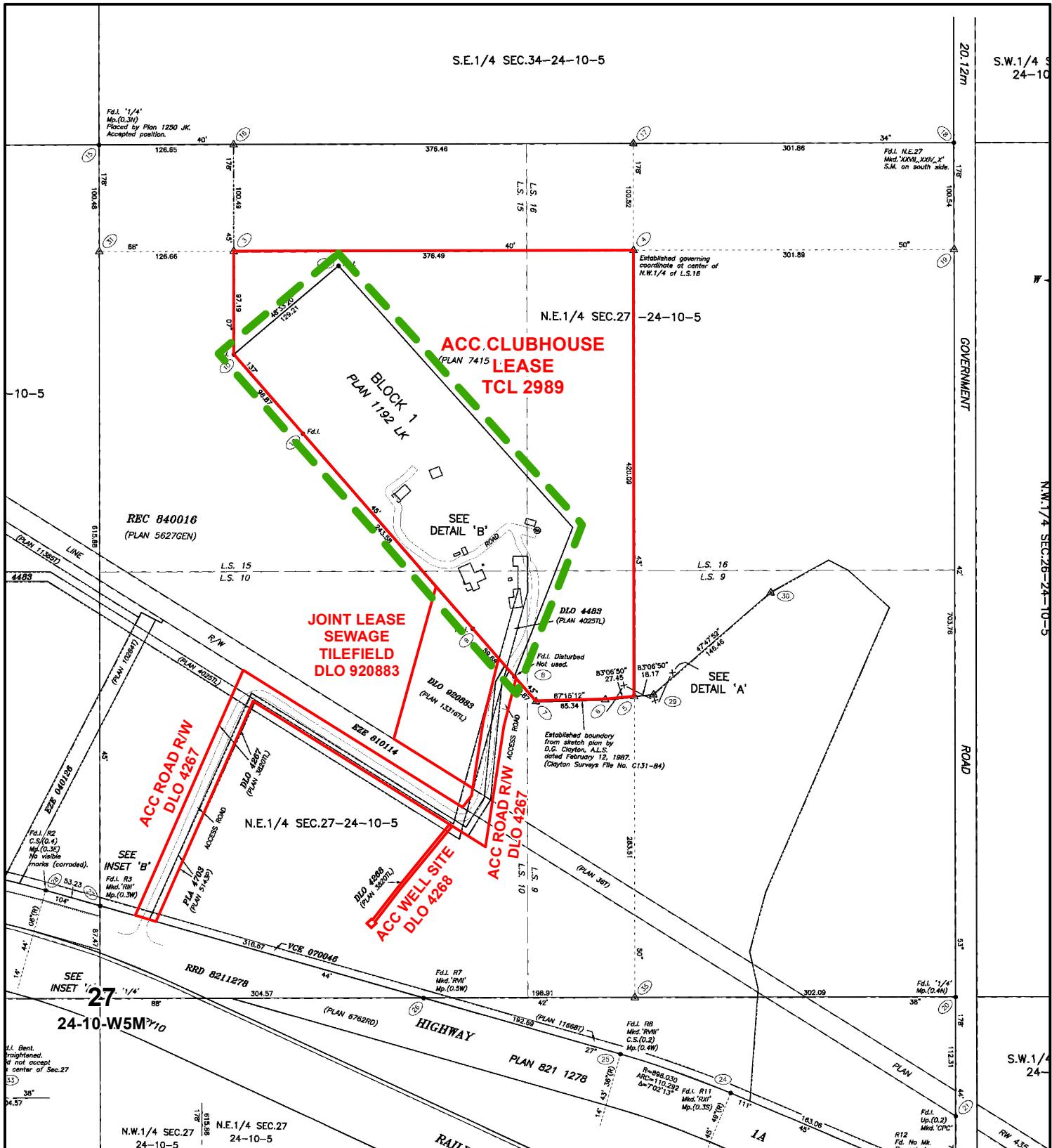
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ATTACHMENT 2

Survey Lease Map and proposed Direct Control (DC) area

S.W.1/4 S
24-10



Legend

- ACC Lease Boundary
- Proposed Land Use Bylaw Amendment
From Conservatoion of Wildlands (CW)
to Direct Control (DC)

ACC CLUBHOUSE LEASE



**ALPINE CLUB
OF CANADA**
**CLUB ALPIN
DU CANADA**

MAP 2

Proposed LUB Amendment

A horizontal scale bar with numerical markings at 0, 50, 100, and 200. The word 'Meters' is written in a cursive font to the right of the scale bar.



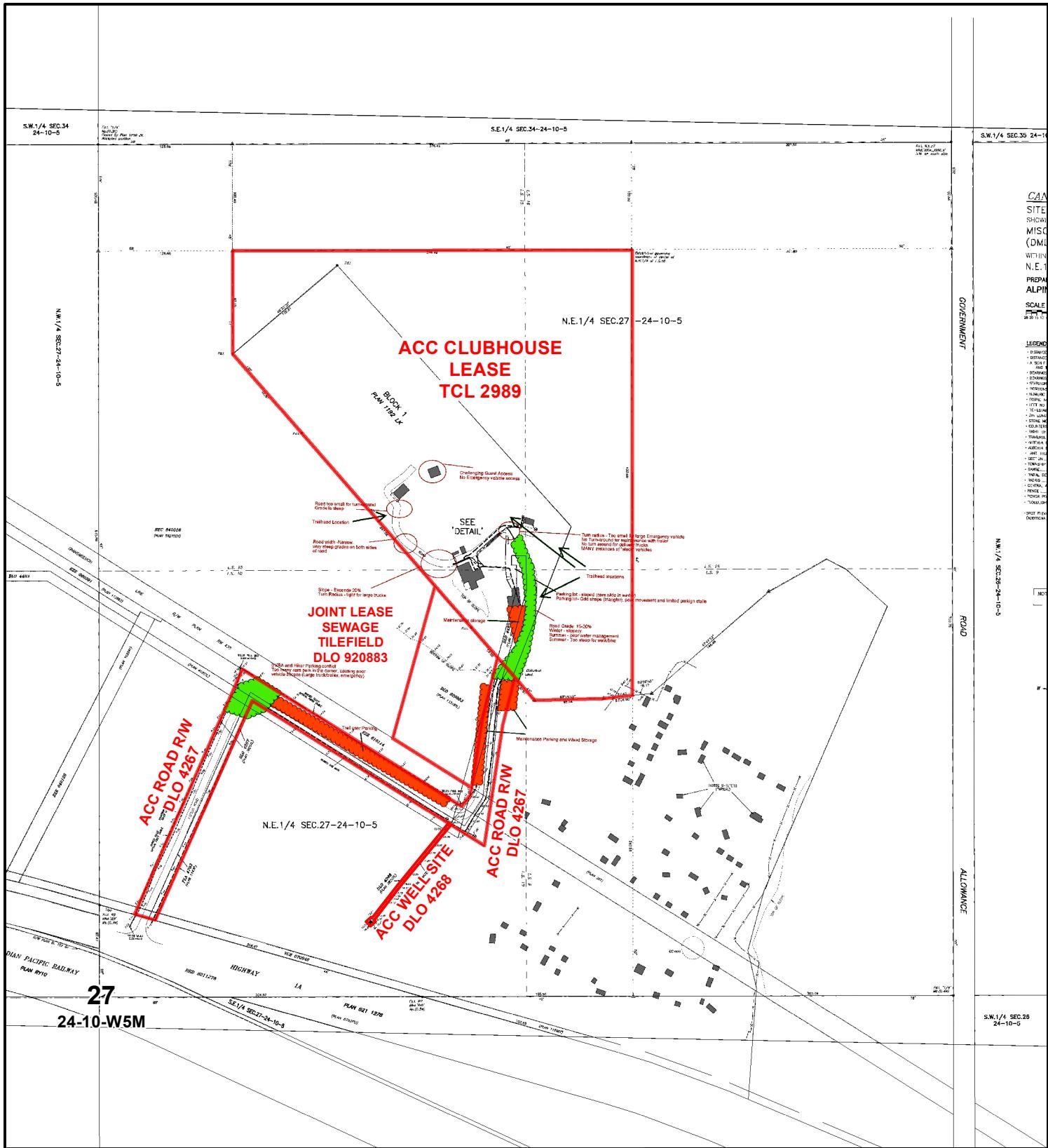
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Date: 2025-09-17



ATTACHMENT 3

Site Issues Map

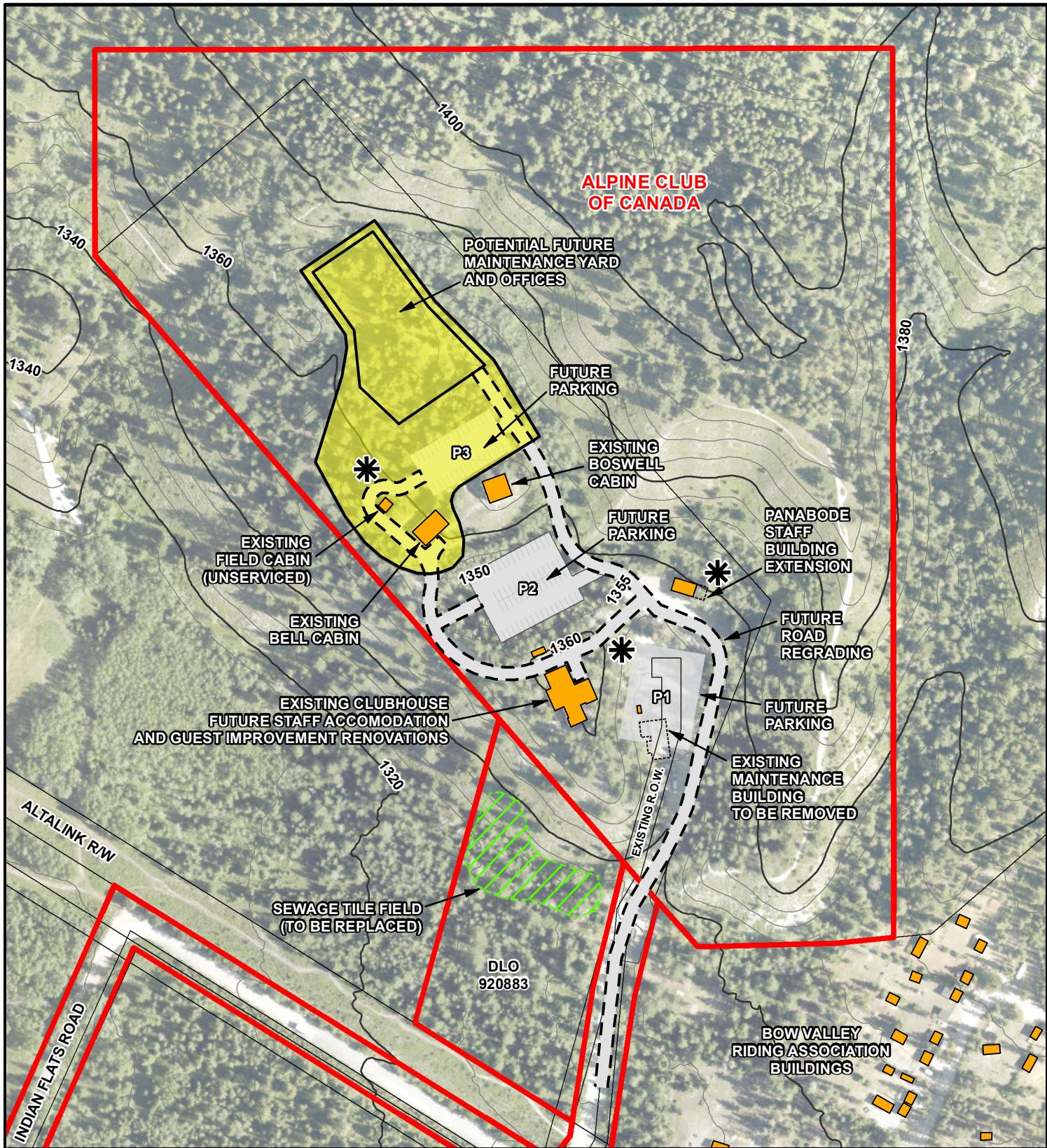


ALPINE CLUB OF CANADA
CLUB ALPIN DU CANADA



ATTACHMENT 4

ACC Clubhouse Lease Future Land Use Map



ACC CLUBHOUSE LEASE CONCEPT PLAN

MAP 4

Future Land Use

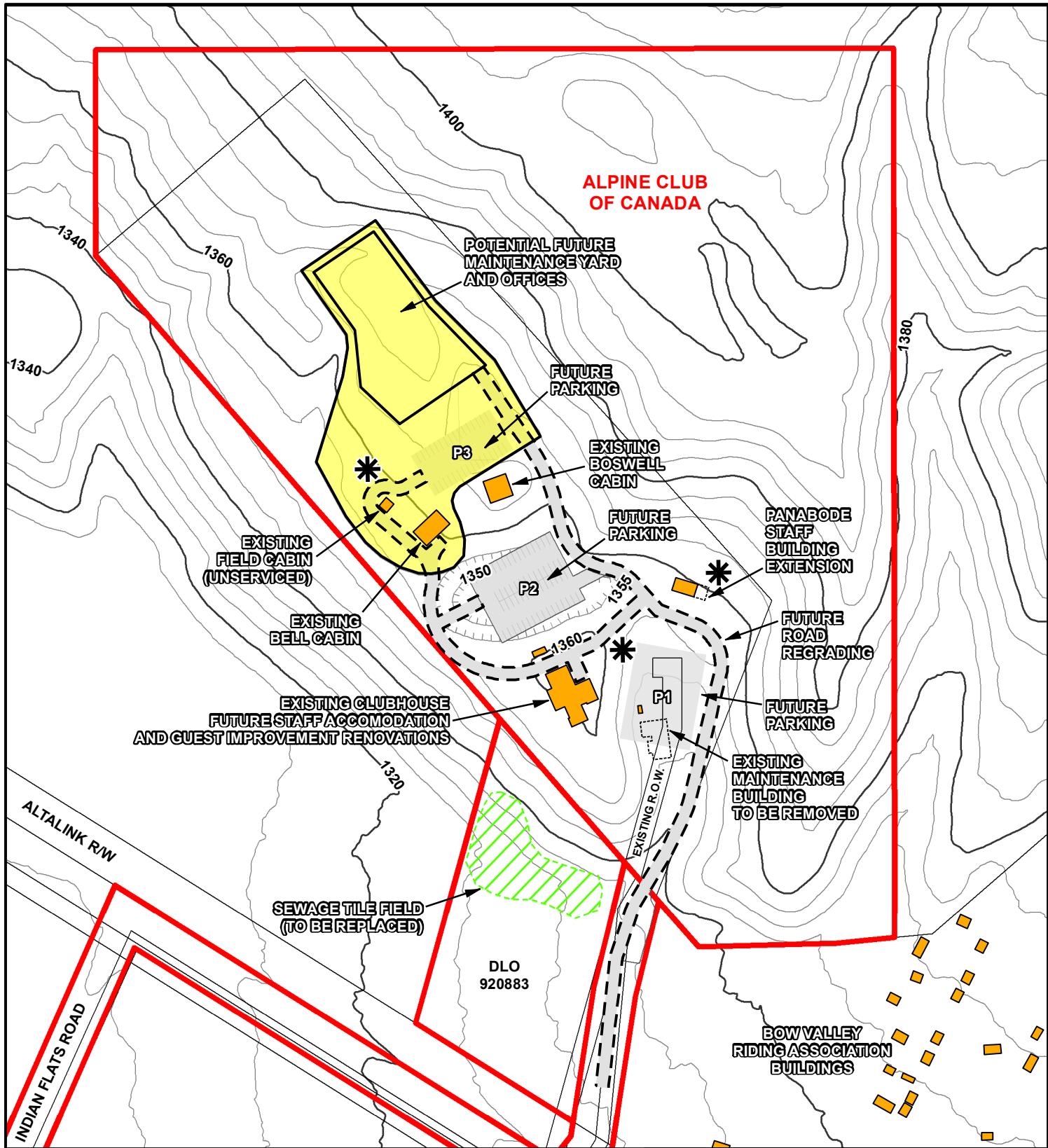
0 5 10 20 30 40 50 60 70 80 90 100 Meters

1:2,500



File: ACC_04

Date: 2026-01-15



Legend

- ACC Lease Boundary
- Existing Building
- Potential Road Re-Alignment and Regrading to 10% where feasible
- Future Redevelopment Potential - Maintenance Yard, Offices, Parking, Employee Housing, Visitor Accommodation
- Potential Employee Housing Site



ACC CLUBHOUSE LEASE CONCEPT PLAN

MAP 4

Future Land Use

A scale bar with numerical markings from 0 to 100 in increments of 10. Below the scale, a horizontal line is divided into four equal segments. The first segment is labeled "1:2,500" and "Meters".



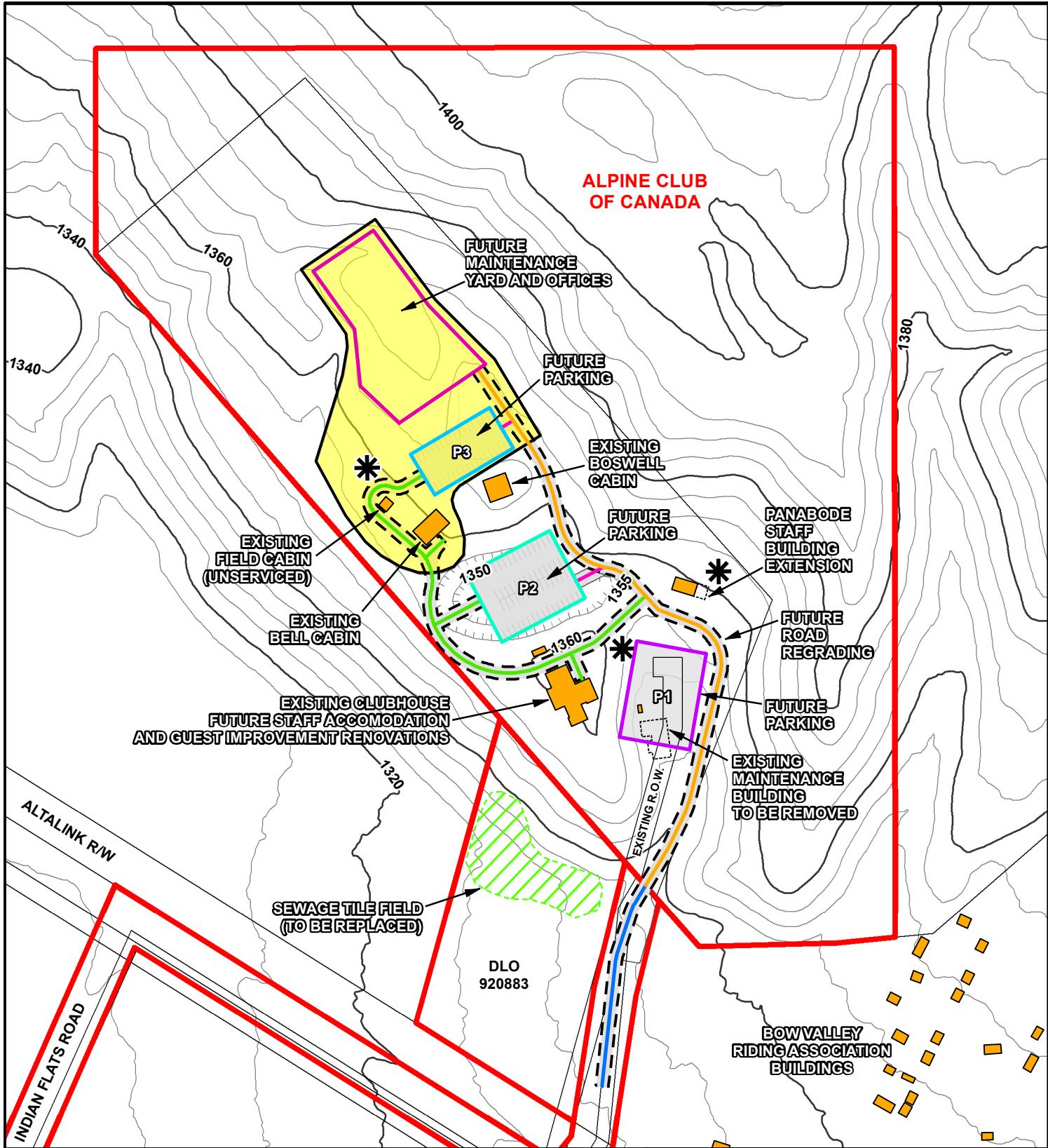
File: ACC 04

Date: 2026-01-15



ATTACHMENT 5

Proposed Polygon Dimensions And Road Lengths Table/Map



Legend

- ACC Lease Boundary
- Existing Building
- Potential Road Re-Alignment and Regrading to 10% where feasible
- Future Redevelopment Potential Maintenance Yard, Offices, Parking, Employee Housing, Visitor Accommodation
- Potential Employee Housing Site
- Contour (20m Interval)
- Contour (5m Interval)
- Depression (5m Interval)

Road Length

LENGTHS		
NAME	ft	m
Road 1	321.79	98.08
Road 2	989.07	301.47
Road 3	68.57	20.9
Road 4	891.67	271.78

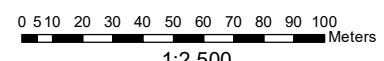
Road 4

AREAS		
NAME	sq ft	m ²
P1	16506.67	1533.54
P2	17127.45	1591.20
P3	10214.65	948.98
Maintenance Yard	36456.43	3386.93



AREA & LENGTH CALCULATIONS

Future Land Use



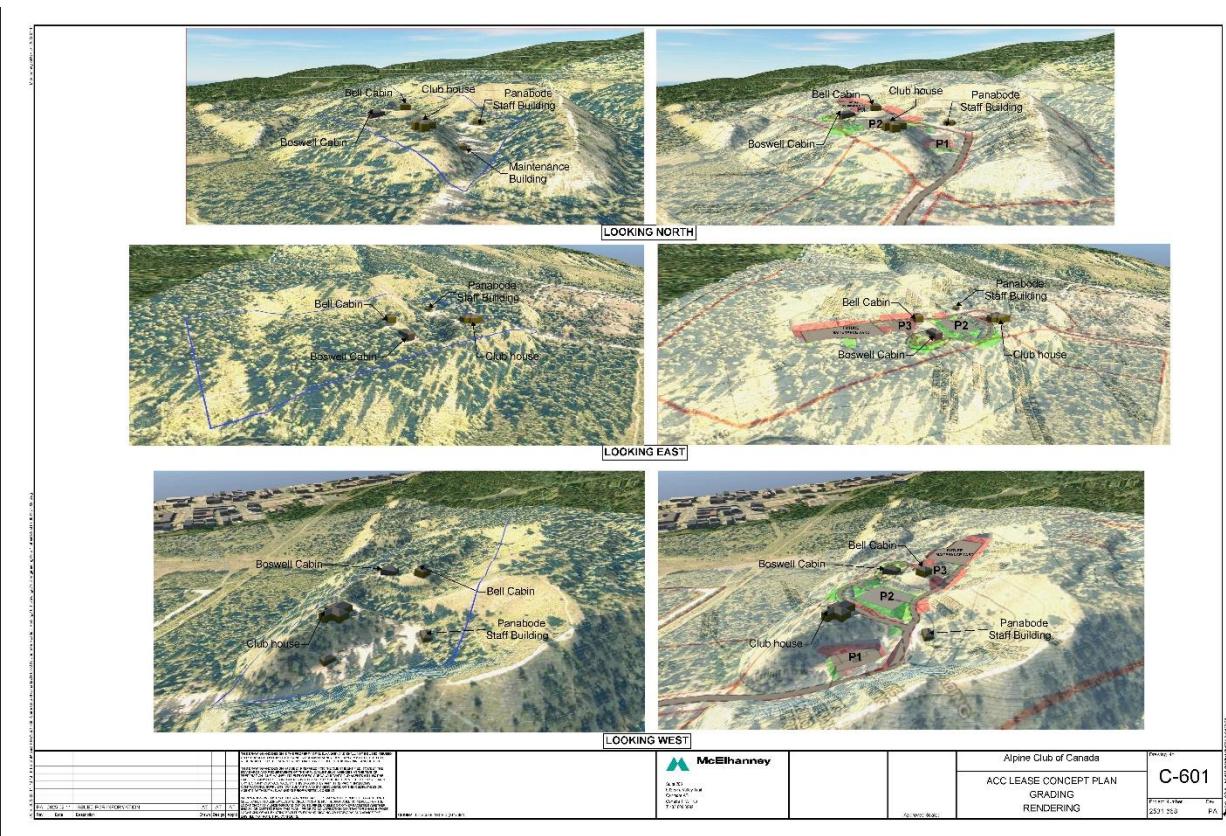
File: ACC_05

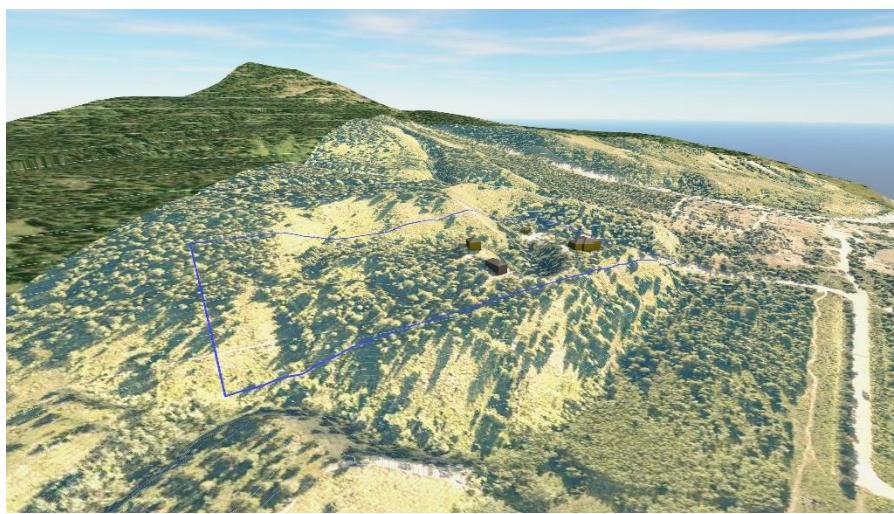
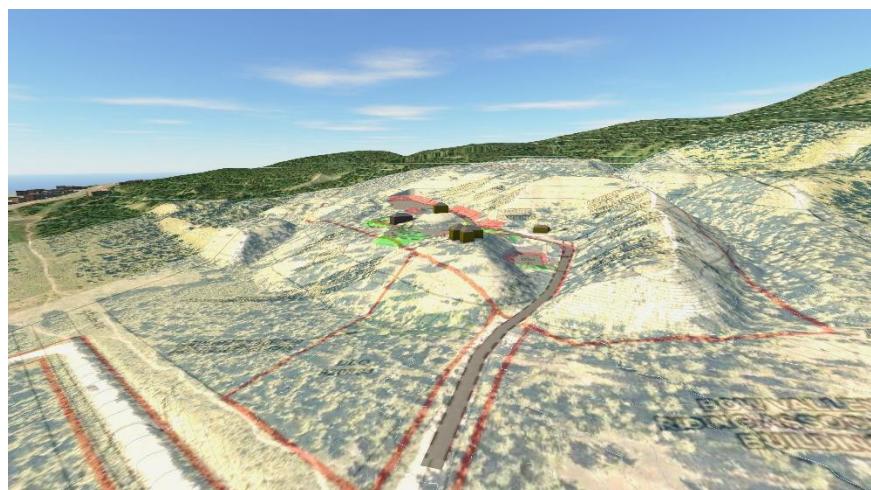
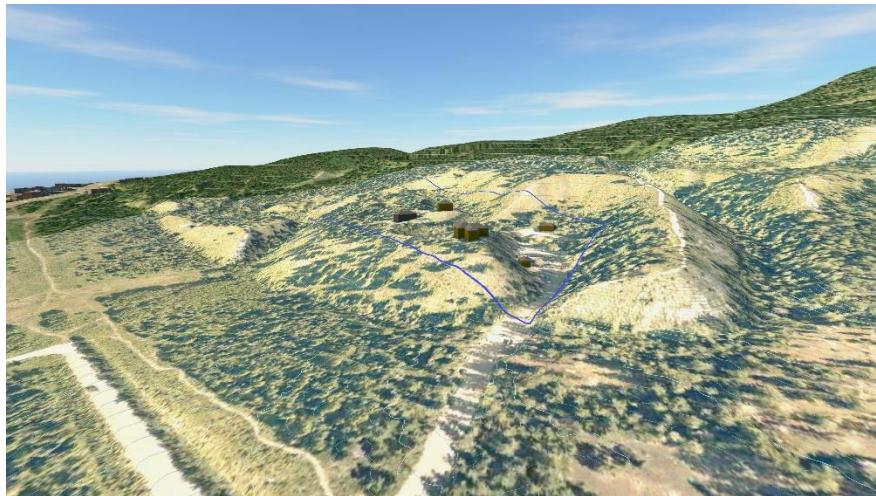
Date: 2025-09-23

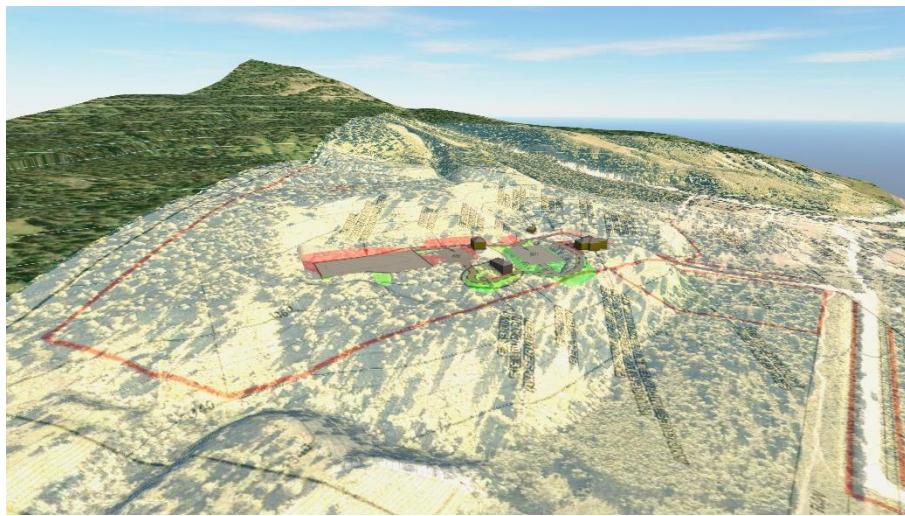


ATTACHMENT 6

Engineering Re-Grading Map



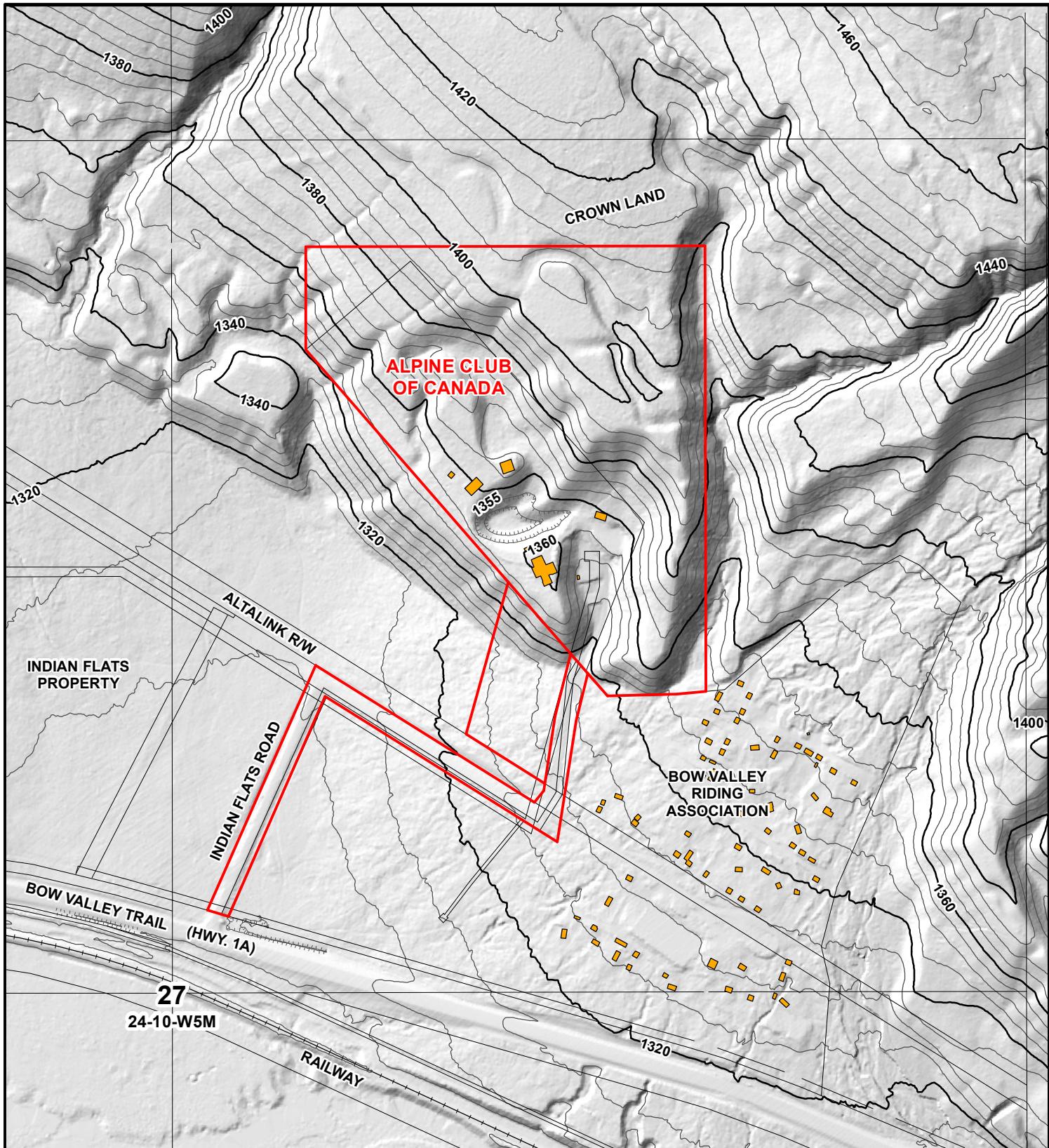






ATTACHMENT 7

1:5000 Topography Context Map



Legend

- ACC Lease Boundary
- Existing Building
- Contour (20m Interval)
- Contour (5m Interval)
- Depression (5m Interval)



ACC Site Topography

0 25 50 100 150 200 Meters
1:5,000



File: ACC_07

Date: 2025-02-07



ATTACHMENT 8

ACC Development History



ACC Development History

Over the past three decades, ACC has evaluated numerous development options to improve infrastructure for staff and visitor accommodations, provide sufficient maintenance and office facilities, and enhance safety for access and parking. The following summary identifies these various attempts, undertaken with the recognition that the current lease is situated within a local wildlife habitat patch.

1989 Lease expansion

The original lease (DC District application) was amended to include an additional 12 acres of land which would function as a buffer to accommodate future development and allow for club expansion. At the time there was concern that the upper benchlands would be developed by other interests.

1995 Master Plan

The ACC leasehold was included within the Town of Canmore limits during the 1991 annexation, recognizing its adjacency to the Town boundary and its potential for development (The Alberta Gazette, September 30, 1991). At that time, provincial and municipal authorities determined that Canmore should have authority over lands where future growth and servicing needs would directly affect the community.

The Town of Canmore annexation of the ACC lease lands created concerns about land designations and the ability of the ACC to continue operating on the site. ACC has historically discussed its long term plans with Town of Canmore planning staff. Notes from meetings in the late 1990s indicate that staff expressed no concerns with incremental, consistent expansion of ACC facilities, provided the Club remained engaged in the planning process. While these discussions are recorded in ACC's internal notes rather than formal Town policy, independent reporting in the Canmore Leader at the time confirms that ACC's operations were recognized under the new Wildlands Conservation zoning, with ongoing activities classified as discretionary uses (Burke 1998).

The Town of Canmore's plans to designate the lower benchlands as Urban Reserve and the upper benchlands as Conservation were ultimately replaced with the WC District through Bylaws 18 and 21(Z)97 in 1997/98. During this period, the ACC drafted a Master Plan to address many issues that are still relevant today, including improved parking, the slope and width of the access road for emergency vehicles, upgraded maintenance facilities, new offices, repaired utilities, and re-imagined visitor accommodation. The ACC reached the development permit stage in 2004, but the application was withdrawn due to opposition and permitting challenges. As a result, the underlying access, maintenance, and staff housing issues identified in the 1995 Master Plan remain unresolved, and continue to provide the basis for the current expansion proposal.

2000 ACC Clubhouse Expansion

The ACC Clubhouse expansion set out to create a more welcoming and functional facility for members, guests, and staff. Plans were drafted to modernize the facility by improving the arrival experience, increasing storage, expanding offices, enhancing energy efficiency, and allowing for future growth. Development Permit 2001-45 was issued, and the work was completed.

2005 Boswell cabin development permit

In February 2005, an Environmental Impact Statement was presented to the town of Canmore's Environmental Advisory Review Committee (EARC) in support of a new visitor accommodation



cabin that was subsequently approved and constructed. The view of the planning department at the time was to limit visitor accommodation to 60 beds as this was the original number for the entire lease as identified by the MD of Bighorn in its 1991 development permit approval for a different application.

2016 Water and Sanitary Servicing Study

The ACC commissioned MMM to prepare a water and sanitary sewer servicing study to connect municipal services directly to the ACC lease site. This connection would allow for the existing sewage tile field and existing water well to be decommissioned and restored. The estimated cost at that time was between \$2.5 to \$3 million and determined to be prohibitive.

2017 Nordic centre accommodation/office relocation option

In early 2018, the director of the ACC proposed to the provincial government to include a 100 bed hostel style facility at the Canmore Nordic Centre (CNC). The purpose of this was to provide on site accommodation for out of town athletes training at the CNC. The building was also proposed to include offices for ACC staff. This would generate a revenue stream to finance the ACC club house concept plan as well as improving office space on the ACC leasehold site. Provincial agencies identified constraints and subsequently this proposal was not pursued further after February 2019.

2019 Water and Sanitary Servicing Study

In 2019, ACC received options and a cost estimate to refurbish the existing wastewater treatment facility. This was not followed up as the Covid 19 Pandemic was starting and costs were determined to be prohibitive. The existing tile field will likely remain for the medium term.

2022- Present; The Search for Alternative Locations for ACC Business Functions

For at least the past 10 years, ACC staff have been searching for alternatives that would improve the safety and functionality of their maintenance facility, water and sewer infrastructure, increase usable office space and secure additional staff housing. Between 2022 and 2024, ACC staff investigated the following alternative locations for a new maintenance site. The extra space required is approximately 0.3 hectares;

- *Exshaw industrial – Diamond Drive* was a 0.32 ha parcel that was offered for sale or lease to the ACC for combined maintenance and office function but the cost was determined not to be feasible, and the landowners subsequently rescinded the offer.
- *Deadman's Flats – Limestone Valley Road* serviced parcels were evaluated but were also determined to not be financially feasible.
- *Alternative industrial land purchase in Canmore*- The ACC evaluated several industrial lots for sale in the Elk Run industrial park. Each of these lots were of insufficient size (0.02 ha) to meet the current and anticipated requirements for the ACC maintenance facility and/or office space. Land costs were also considered economically unfeasible.
- *Alternative crown land dispositions*- ACC staff are in regular contact with Geoff Smith (Provincial dispositions manager of Integrated Land Delivery South, Forestry and Parks. Mr. Smith surveyed potential crown land dispositions, but none were identified as available within the Bow Valley. Alternative nearby Crown land locations that could meet ACC's needs have been investigated; however, none have materialized, and such options are unlikely to become available in either the near or long term. The current ACC Crown lease is a commercial lease



authorized by the provincial government. The lease terms are affordable and secure for the long term.

- *Relocate maintenance function or entire ACC operation to another municipality* - This was seriously considered by the ACC Board of Directors since as far back as 2022. Locations such as Golden, BC, are still being considered.

If the entire operation moved to Golden or another location, staff accommodation, maintenance and office space would become new capital costs. The current ACC lease site has been home to the ACC since 1972. Most existing, longtime staff are committed to staying in Canmore and would be reluctant to relocate. Moreover, in addition to historical context, Canmore and the Bow Valley have a critical mass of guides and expertise unparalleled in Canada. As such, the Board of Directors has indicated ACC would prefer to stay in Canmore. As such, with no feasible or financially favourable alternatives, and with the history of the ACC in Canmore, the current lease area is the most desirable and financially feasible site for its operations for the foreseeable future.



ATTACHMENT 9

ALPINE CLUB OF CANADA 2024 FIRESMART PLAN



Alpine Club of Canada Firesmart Plan

201 Indian Flats Road

Prepared: March 2023,

Updated: January 2024

The Alpine Club of Canada is located in a hilly forested area of Grotto Mountain approximately 1km east of the Town of Canmore. The property has significant slopes with a high percentage of dense Douglas-fir. With the recent large scale forest fires and drought conditions in the province, the ACC would like to continue firesmart activity on the lease.

Utilizing the assessment tools available in the FireSmart – Protecting Your Community, the hazard level of this lease site has been assessed as “Extreme” danger for wildfire risk. The ACC would like to perform firesmart mitigation measures on the lease to decrease the risks of wildfire to the property and buildings at this property.

Firesmart – Protecting your community recommends the establishment of priority zones around each building. The respective zones recommend different fuel treatment activities. The ACC would follow the guidelines outlined in this guide for the firesmart work.

Priority Zone Identification:

See shaded map of the ACC property.

- Blue Shaded areas have a 30% and greater slope
- Red shaded areas have a 55% and greater slope
- Green shaded: Priority Zone 2 – adjustment areas.

The ACC property is on very hilly terrain that requires an additional slope assessment to confirm the treatment areas for priority zone 2. Firesmart – Protecting your community recommends where a terrain below a building is at a 30% slope, fuel treatment distances would increase by 2x downslope and 1.5x horizontal. Where terrain below a building is at a 55% slope the distance would be increased by 4x downslope and 2x horizontal.

Aerial View:

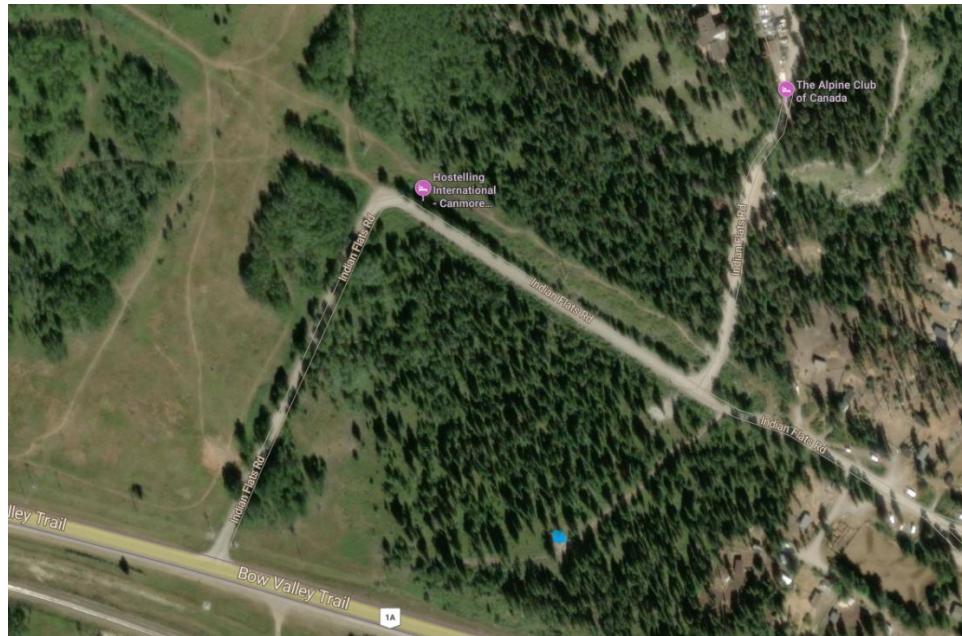
Below is an aerial image of the lease with the firesmart – zone 2 boundaries highlighted in red. Buildings are highlighted in Blue.



Attached is an aerial image of the road.

Visible is the tree growth close to the road from Highway 1A to the Clubhouse.

Also visible is the water well pump house. (highlighted in Blue)





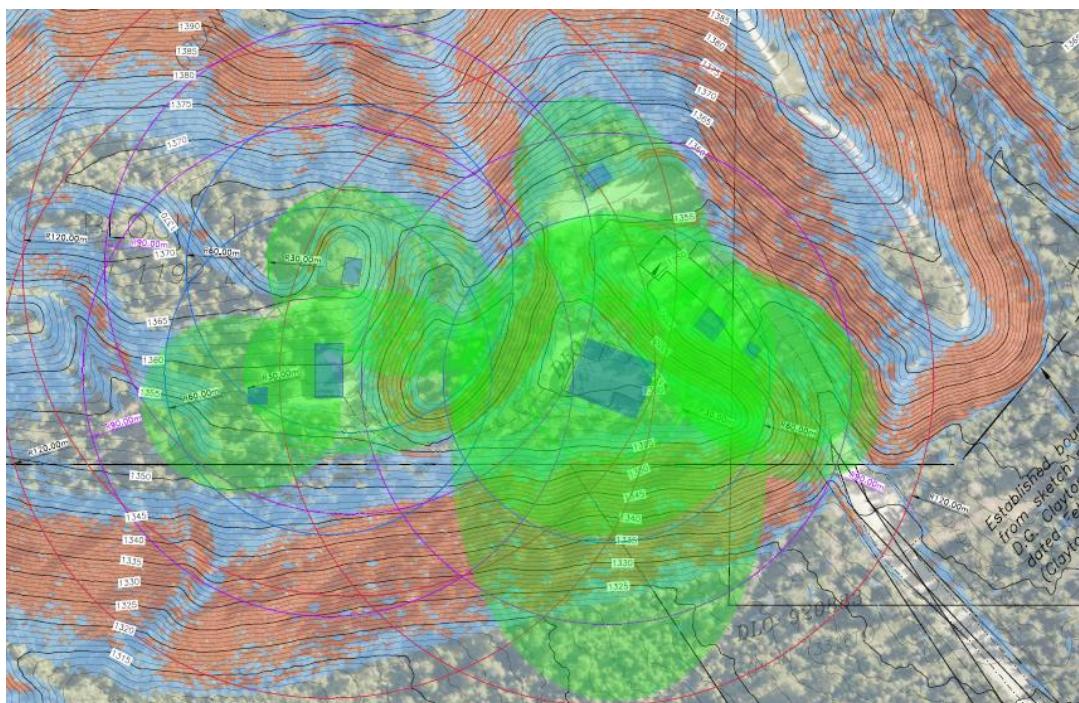
Topographic View:

Below is a topographic image of the lease site.

Blue shaded areas have a slope between 30% and 54%

Red shaded areas have a slope above 55%

Green shaded areas represent the adjusted priority zone 2 areas based on slopes downhill of structures.



Zone 2 assessments for ACC lease:

Clubhouse Building :

- Slope assessment: Downslope: 55%
- Result: Zone 2 mitigations shall extend 120 metres in all directions
- Mitigation efforts will not extend off the lease where this distance exceeds the ACC leasehold.

Bell Cabin:

- Slope assessment: 55% downslope in south direction. < 30% slope in all other directions.
- Result: Zone 2 mitigations shall extend 120 metres to the south of the structure

Field cabin

- Slope assessment: > 30% slope to the North-West of the building.
- Result: Zone 2 mitigations to extend 60 metres in the North-West direction



Boswell Cabin:

- Slope assessment: >55% downslope south of building, >30% downslope to the North
- Result: Zone 2 mitigations to extend 120 metres south, and 60m north of the building

Panabode:

- Slope Assessment: >30% and >50% slopes horizontal and uphill of the building
- Result: No extension of Zone 2

Maintenance Building

- Slope Assessment: >55% slope horizontal and downhill of the building
- Result: Zone 2 mitigations should extend to 60m.

Water Well – Pump Building

- Slope Assessment: <30% slope.
- Result: Zone 2 mitigations extend the standard length of 30m.

Migratory Bird nesting:

In compliance with regulations, all tree falling work should be completed before April 15th, or after August 16th.

Disposal of forest debris:

The ACC would like to burn brush in place and will obtain fire permit from the Town of Canmore for this purpose

Where possible, trees may be salvaged for firewood to be used at ACC backcountry huts located within Alberta.

Firesmart Mitigations by Priority Zone:

Priority Zone 1:

The area immediately adjacent to a given building and extends outward in all direction for a recommended minimum of 10 metres in flat terrain. The main objective of vegetation management is to create an environment that will not support fire of any kind.

Fuel Reduction Strategy:

- Remove trees within 3 metres of the structures
- Remove tree branches within 3 metres of structures
- Where a tree is within 3 metres and there is a desire to keep the tree, ensure that tree has adequate spacing (5m) from neighbouring tree canopy.
- Remove small trees and shrubs. Particularly juniper and pine trees.
- Remove trees where there is less than 4 metres spacing at the base, or 3 metre spacing in the canopy between trees (thinning)



Priority Zone 2:

It begins 10 metres from the building and extends to 30 metres from the building. On sloped terrain, the width of this zone must be extended and will be discussed later. The main objective is to create an environment that will only support fires of lower intensity and rate of spread.

Fuel Reduction Strategy:

- Understory thinning; Removal all trees growing under the canopy of a taller tree.
- Pruning; remove the live and dead branches 2 metres from the ground
- Thinning; remove trees where there is less than 4 metres spacing at the base, or 3 metre spacing in the canopy between trees (thinning)
- Some thinning will require a multi-year approach to complete, as recommended to reduce the risk of wind damage

Priority Zone 3:

It begins 30 metres and extends to 100 metres from the building. Fuel management in this area may be needed when high hazard levels from continuous forest vegetation and steep topography are not reduced enough by fuel management in Priority Zone 2. Within the ACC leasehold, this area is located to the northwest of the Boswell and Bell cabins. Limited treatment is required but some understory thinning and pruning is recommended.

Fuel Reduction Strategy:

- Understory thinning; Removal trees growing under the canopy of a taller tree.
- Pruning; remove the live and dead branches 2 metres from the ground
- Thinning; remove trees where there is less than 4 metres spacing at the base, or 3 metre spacing in the canopy between trees (thinning)

Image 1: Clubhouse – main building. Photo taken from outside extended Zone 2 area showing steep hills with dense forest.





<p>Image 2: Boswell Cabin. Photo taken within the Zone 2 priority area showing steep terrain on south and east side of building with some dense forested areas.</p>		
<p>Image 3: Boswell and Bell Cabin. Photo taken within zone 2 area showing dense forest below cabins in steep terrain.</p>		
<p>Image 4: Clubhouse – main building – Photo taken within the priority zone 2 area and shows steep and forested terrain.</p>		

Road overgrowth concerns:

The Alpine Club of Canada is located in a hilly forested area of Grotto Mountain approximately 1km east of the Town of Canmore. The property is accessed on a private road on a public lease (DLO-4267). This road is approximately 1km long.

The trees and shrubbery along this road has not been maintained since the road was first built. As a result, there are many large trees growing directly on, or near the driving surface. Tree branches block sightlines and during heavy snowfalls the branches block the driving lanes.



The ACC wishes to remove trees that are growing between the driving surface and the bottom of the ditch, and thin the trees that are on the lease in the ditch. This will improve sightlines, snow removal efforts and driving safety on the road.

See images for examples:

<p>Image 1: Snowfall with Plow:</p> <p>Trees and shrubs are growing into the driving surface. Branches are blocking sightlines.</p> <p>Action: Remove trees and shrubs.</p>	
<p>Image 2: Snowfall -tree branches reaching over road. Shrubs and trees border driving surface.</p> <p>Action: Remove trees and shrubs</p>	



<p>Image 3: Ditch is visible next to the road. Bottom of the ditch is in the middle of the picture, with dense trees close to the driving surface.</p> <p>Action: Remove trees between road and bottom of ditch. Some tree thinning along ditch.</p>	
<p>Image 4: Road surface with trees. Ditch is visible behind the trees along the road. It is visible that natural terrain is grassland with few trees in the field.</p> <p>Action: Remove trees between road surface and bottom of ditch.</p>	
<p>Image 5: Trees growing next to road. Sightlines are impacted and branches are growing over the road.</p> <p>Action: Thin trees and shrubs. Remove dangerous trees.</p>	



<p>Image 6: Trees growing next to road. Sightlines are impacted. Signage is hidden by new growth.</p> <p>Action: Remove and thin trees along the road surface. Ensure signage is visible.</p>	
<p>Image 6: new growth is blocking views of signs, encroaching on road surface.</p> <p>Action: Thin trees and shrubs with-in 3-5 meters of the road to allow clean sightlines.</p>	



ATTACHMENT 10

Environmental Impact Statement

Under Separate Cover at

<https://www.dropbox.com/scl/fi/itzfxn08sja8io8wxcfub/Omnia-ACC-EIS-20260124.pdf?rlkey=6qcehqmwuk01beyx6euwyblj&dl=0>



ATTACHMENT 11

Proposed ACC Direct Control District



14.XX ACC DC DISTRICT [BYLAW # ____]

14.XX.1 Purpose

The purpose of this District is to provide a framework for future redevelopment of the Alpine Club of Canada (ACC) Clubhouse Provincial lease lands.

14.XX.1.1 This Direct Control District is intended to improve on-site staff accommodation availability, existing visitor accommodation units, maintenance and office facilities, public parking access and to better align with Town standards for road and emergency access.

14.XX.2 Compliance with Bylaw 2018-22

14.XX.2.1 Unless otherwise specified, the rules and provisions of Sections 1, 2, 8, 9, 10, 11, 12, and 13 of Bylaw 2018-22 apply to this Direct Control Bylaw.

14.XX.3 Reference to Bylaw 2018-22

14.XX.3.1 Within this Direct Control Bylaw, a reference to a section of Bylaw 2018-22 is deemed to be a reference to the section as amended from time to time.

14.XX.4 Development Authority

14.XX.4.1 The Development Authority shall be the Development Officer.

14.XX.5 Permitted Uses

Accessory Building

Accessory Uses

Staff Accommodation

Hostel

Office

Open Space

Outdoor Storage

Parking Area

Similar Use

Uses existing and approved prior to 3rd Reading of Land Use Bylaw 09-99 of 1999

Visitor Accommodation

14.XX.6 Discretionary Uses

Eating and Drinking Establishment

Similar Use



14.XX.7

Regulations

- 14.XX.7.1 Building Height - The maximum building height shall be 13m with a minimum eaveline of 10m.
- 14.XX.7.2 Fencing – Fencing will be limited to areas required for secure open storage. Fencing shall be a minimum of 2.4m and shall be constructed to prevent wildlife and unauthorized human access.
- 14.XX.7.3 Design Requirements – Building cladding and roofs shall be fire resistant such as metal or cementitious materials and adhere to Firesmart principles.
- 14.XX.7.4 On-site Water and Wastewater Facilities - The water and wastewater facilities shall meet Provincial standards and be sized commensurate with staff and visitor demands.

14.XX.8

Use Specific Regulations

- 14.XX.8.1 Accessory Uses – Accessory Use as per the Canmore Land Use Bylaw shall include a maintenance facility for the purposes of manufacturing, repairing, and storing goods, fuel, propane and other equipment related to the operation of ACC-operated structures. It may include office space no greater than 40m² for the purpose of managing the maintenance facility function. The maximum enclosed space for a maintenance facility shall not exceed 1500 m² in total area of all floors.
- 14.XX.8.2 Eating and Drinking Establishment – This use is intended as an ancillary use, limited in scope to ACC guests and hikers/climbers using the trailhead staging area. Offerings will be limited to pre-packaged goods, limited beer and wine selection. Service space will be limited to 35m².
- 14.XX.8.3 Office Space - Maximum office space shall not exceed 1100m² in total area of all floors. Office space used for maintenance facility operations shall be excluded from this maximum limit.
- 14.XX.8.4 Open Storage - The maximum site area including fenced, outdoor storage and enclosed structures shall not exceed 3300m².
- 14.XX.8.5 Parking - The maximum number of designated parking stalls overall shall not exceed 140 stalls on the lease site. Parking may be constructed of compacted gravel. Parking configurations shall be in accordance with Canmore Engineering Design and Construction Guidelines at Development permit stage.
- 14.XX.8.6 Staff Accommodation Built Form – Staff accommodation may take the form of units attached to existing structures, apartment style units, shared accommodation or stand-alone structures.



- 14.XX.8.7 Staff accommodation limits – Staff accommodation shall be enumerated in beds that may be allocated across one or more dwelling units. The maximum beds constructed exclusively for employee housing shall not exceed 15 beds.
- 14.XX.8.8 Visitor Accommodation - Visitor Accommodation shall continue to offer a variety of dormitory style and self-contained units. Renovation of units into alternate accommodation configurations and additions or replacement of existing buildings may be undertaken without an amendment to this District provided the 60-bed visitor accommodation maximum is maintained.

14.XX.9 Development Overlays

ACC Land Use Concept - *The ACC Future Land Use Concept* and associated supporting documents shall inform applications for development permits or building permits. Schedule A, “Future Land Use” Map 4 conceptually describes potential future land uses. Phasing of development permit applications shall be evaluated and prioritized by the ACC on an annual basis.

Environmental Impact Statement (EIS) - The EIS prepared by Omnia Ecological Services and accepted as meeting Town of Canmore policy shall inform environmental requirements where reference is made to development permit conditions. ACC monitoring measures are identified for the PSA only.

The (proposed) Canmore Area Trails Master Plan (CATMP) states that monitoring will be required for some trails where use should be minimized in the area. In section 7 of the EIS, ACC will coordinate with the Province (and/or Town) to support Provincial implementation policy, measures, monitoring and mitigation such as decommissioning redundant trails within the greater ACC Crown lease land, thereby improving trail management, enhancing visitor experience, and contributing to wildlife habitat conservation within the Project Study Area (PSA) and Local Study Area (LSA).

Within the PSA, monitoring will be undertaken under the lead of the Province to verify the effectiveness of the mitigation measures outlined in Section 7.1 of the EIS. Table 7.2 of the EIS links each key mitigation measure to its corresponding recommended monitoring action.



14.XX.10 Variances

Notwithstanding the variance regulations set out in 1.14, the following variances may also be considered within this District where the Development Authority is satisfied that the architectural integrity of a building would be enhanced. Variances may be granted to allow

- a) 20% of the building to exceed the maximum height by up to 20%,
- b) 20% of the building to exceed the maximum floor area by up to 20%,
- c) The maximum number of Staff Accommodation beds to be exceeded by 20%.

14.XX.11 Definitions

14.XX.12 Schedules

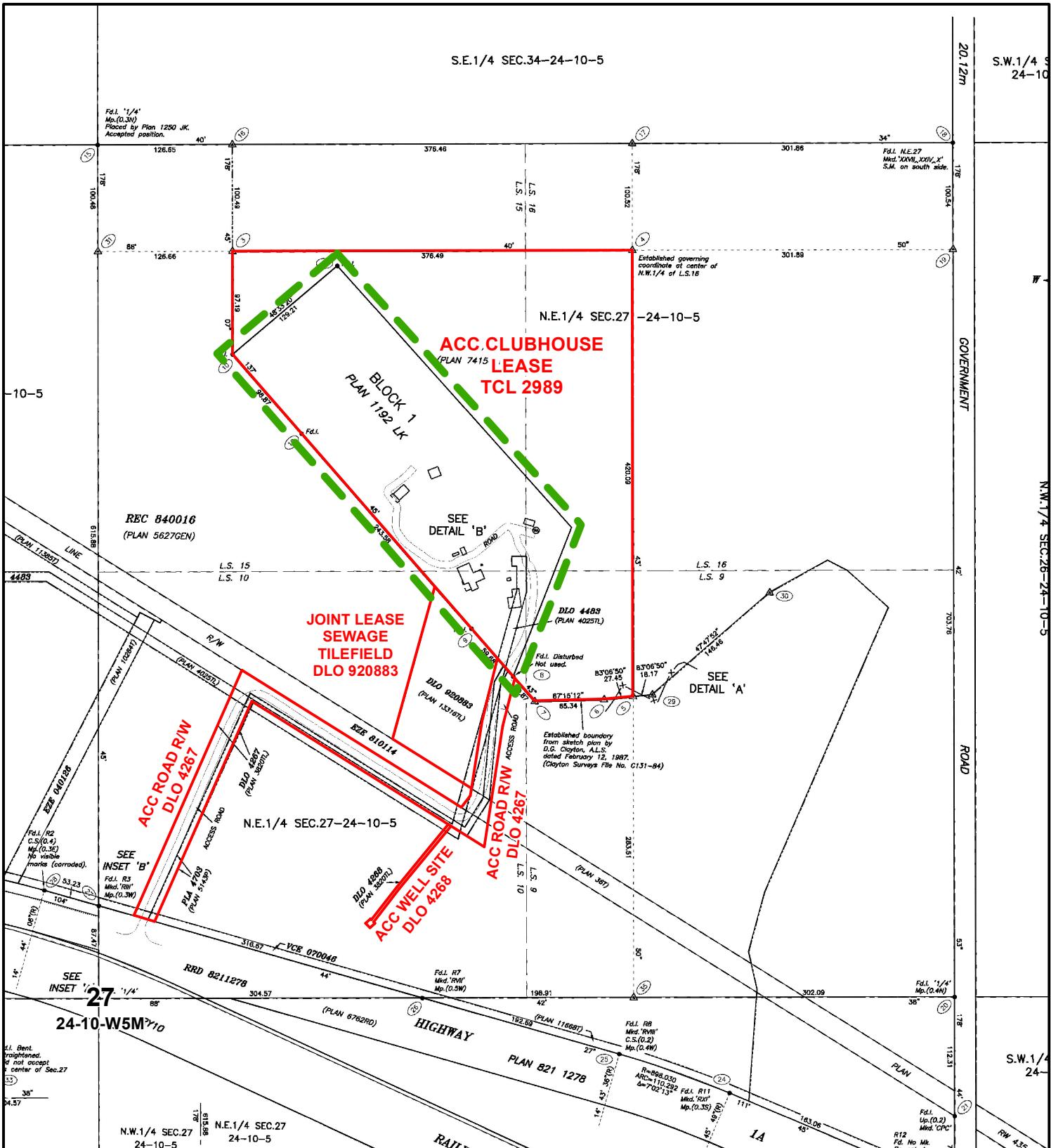
Schedule "A" shows the location of this Direct Control District, and forms part of this Bylaw.

SCHEDULE A: ACC DC District

Legal Description: Town of Canmore Parcel ID: 432464, being Plan 1192LK

Municipal Address: Alpine Club of Canada, 201 Indian Flats Road, Canmore AB

S.W.1/4 S
24-10



Legend

- ACC Lease Boundary
- Proposed Land Use Bylaw Amendment
From Conservatoion of Wildlands (CW)
to Direct Control (DC)

ACC CLUBHOUSE LEASE



ALPINE CLUB
OF CANADA
CLUB ALPIN
DU CANADA

MAP 2

Proposed LUB Amendment

A scale bar at the bottom of the map, consisting of a horizontal line with tick marks and numerical labels. The labels are 0, 50, 100, and 200, with the word 'Meters' written below the 200 mark. The line is black with white tick marks.



File: ACC 02

Date: 2025-09-17